1 Q Sure. 2 Ask it --A 3 Trinity considered, and indeed purchased, low-power stations. Trinity. And what I want to ask you about is I 5 have -- I've seen nothing to indicate that Television Translator, Inc., or NMTV ever considered the purchase of low-6 7 power stations. Is that correct? 8 Α I don't believe so, sir. 9 Do you, do you have any understanding as to why TTI 10 and NMTV only wanted to apply for stations and didn't want to 11 purchase any? 12 Α My understanding -- well, well -- the main thing was the finances. We could always try and get a loan from 13 Trinity, but they were much stronger, sir, financially. 14 15 Well, wasn't it also because you didn't get any 0 minority preference when you purchased the stations but you 16 got a minority preference when you applied for a new one? 17 18 That's possible, sir, yeah. Α Well, we haven't, we haven't discussed that yet, but 19 you are aware, of course, that TTI and NMTV certified that it 20 21 was a minority for purposes of obtaining a preference? 22 That is correct, sir. Α 23 Q You knew that? 24 Yes, sir. Α 25 And I'm suggesting to you that the reason why NMTV Q

- 1 | didn't purchase stations was you didn't get a minority prefer-2 | ence when you purchased a station.
  - A That I don't recall, sir.
- Q Pastor, I'd like you to, to look at Bureau Exhibit
  5 47 --
- 6 MR. TOPEL: In the first volume.
- 7 BY MR. COHEN:
- Q -- which is an Annual Meeting of the Board of
  Directors of Translator TV for, for 1982. Just skim that.

  Don't -- I'm not going to be asking any questions about the
- 11 content. And tell me when you've skimmed it.
- 12 A Sir.
- Q What I'm, what I'm -- what I want to know, if you

  can tell me, is you'll notice that in '82 there was a, a sep-
  separate meeting of the Board of Directors of Translator TV,

  Inc. Do you see that? That's the Minutes you have before
- 17 you.

3

- 18 A Yes, sir.
- Q But commencing in '83 and '84 and '85 and '86 and '87, there were meetings of the Combined Board of Directors of Trinity Broadcasting Network and Affiliate Corporations. TTI and NMTV were folded into that. Do you have any knowledge as
- 22 and Mil were roided into that. Do you have any knowledge as
- 23 to why that occurred, that is, the meetings were held on a
- 24 combined basis?
- JUDGE CHACHKIN: You can answer the question.

1 MR. ESPINOZA: No, I don't recall the reason, Mr. 2 Cohen. 3 JUDGE CHACHKIN: Did you object to holding your 4 meetings on a combined basis with TBN? 5 MR. ESPINOZA: No, sir. 6 BY MR. COHEN: 7 Well, did -- wasn't TTI and NMTV a separate 8 corporation? 9 Α Well, in -- to the best of my memory, Mr. Cohen --10 1992. I may be wrong on the dates, but towards the beginning I seem to recall that there wasn't that much to discuss. 11 12 to me it would have been logical that a combined meeting be 13 That would have been practical. 14 Now, are you aware commencing in 1988 NMTV began to 0 15 hold its own annual meeting separate and apart from Trinity? 16 Α Yes, sir. 17 Now, are you aware of why the policy changed in '88? Q 18 I think it was a growing corporation. I think we 19 had more, more to discuss, sir. 20 Do you know whether anybody gave any suggestions -strike that. 21 22 Do you know whether any advice was given by any 23 person to Mrs. Duff or Paul Crouch concerning why the '88 24 meeting should be held separately?

FREE STATE REPORTING, INC.
Court Reporting Depositions
D.C. Area (301) 261-1902
Balt. & Annap. (410) 974-0947

I don't know whose idea it was, but I welcomed it,

25

A

•	l m d no
1	sir.
2	Q But you were never told whose i who, who suggested
3	it?
4	A I don't recall, sir.
5	Q You were never told the basis of the suggestion?
6	A I don't recall, sir.
7	JUDGE CHACHKIN: Why was it practical for a separate
8	corporation to hold meetings with TBN? Even assuming you had
9	very little action, why was that practical?
10	MR. ESPINOZA: My feeling was that at the beginning
11	there wasn't that much going on, and at the same time it, it,
12	it gave the affiliates an opportunity to get a viewpoint of
13	what others were doing, sir. That, that was my feeling, Your
14	Honor.
15	JUDGE CHACHKIN: The viewpoint of, of the affili-
16	ates. You mean the affiliates, you mean the owned-and-
17	operated stations of TBN?
18	MR. ESPINOZA: Well, y I'm, I'm referring to the
19	other, the other corporations that were present is what I
20	meant, sir.
21	JUDGE CHACHKIN: Well, what affiliates are we
22	talking about? Are we talking about program affiliates or are
23	we talking about affiliates whose directors were the same
24	or
25	MR. ESPINOZA: I'm sorry, sir.

1 JUDGE CHACHKIN: -- the majority were TBN and all 2 the other stations that TBN controlled? 3 MR. ESPINOZA: I'm sorry, sir. I meant the other 4 managers from some of the other stations, and it gave us a 5 chance to just to see and to hear what was being done, sir. 6 JUDGE CHACHKIN: Why, why couldn't it -- you attend 7 those meetings, if you wanted to, and still hold, hold a 8 separate meeting of your own? 9 MR. ESPINOZA: I don't recall, sir. I don't know. 10 BY MR. COHEN: 11 Well, I wanted to ask you, following up on what the 12 Judge was --13 Α Yes, sir. 14 -- was asking about, about affiliates. Now, turn to Q 15 the 1984 Annual Meeting, which would, which would be Bureau 16 Exhibit 70, 7 0. 17 Volume 2. MR. TOPEL: 18 BY MR. COHEN: 19 Q You'll notice that the -- I recognize you didn't 20 prepare these Minutes, and I'm not suggesting you did. You'll 21 notice the word "affiliated" is used here. You see that on 22 the top, "Affiliated Corporations"? 23 A Yes, sir. 24 And you'll notice that on page 3 that Translator Q 25 Television, Inc., is, is, is a Corporation which the Officers

1 | are listed. Do you see that? You're listed as Secretary-

- 2 Treasurer?
- 3 A Yes, Mr. Cohen.
- 4 Q And you would agree with me, I take it, that for
- 5 purposes of this Annual Meeting, Television Translator, Inc.,
- 6 is considered an affiliate of, of Trinity. Was that your
- 7 understanding -- or is your understanding?
- 8 A I believe so, Mr. Cohen.
- 9 Now, do you have an understanding as to what --
- 10 turning to -- strike that.
- 11 Do you have an understanding as to in what respect
- 12 or how Translator Television, Inc., was an affiliate of
- 13 |Trinity?
- 14 A We had a, a, a relationship, a bonding, in that we
- 15 had the same vision and the same purpose. That was my under-
- 16 standing.
- 17 Q So, it wasn't a legal relationship, then? It was a,
- 18 | it was a, a moral and a spiritual relationship?
- 19 A No. I believed it to be a, a, a legal relationship.
- 20 Q What, what was the, what was the legal relationship,
- 21 and we're now talking about in 1984?
- 22 A I'm sorry. Strike that. No. I don't think it was.
- 23 It was just an affiliate, sir, with, with a moral, spiritual
- 24 | relationship.
- 25 Q And what I want to ask you, then, is turn to page 3

1 | and look at the other companies that are listed there, for

- 2 example, Trinity Broadcasting of Indiana, Inc., which is just
- 3 above Translator Television, Inc.
- 4 A Yes, sir.
- 5 Q Now, apparently it was also considered an affiliate
- 6 of Trinity Broadcasting Network because it's set forth on the
- 7 same page that Television Translator, Inc., is set forth.
- 8 A Yes, sir.
- 9 Q Did you have an understanding of in what sense it
- 10 was an affiliate of Trinity?
- 11 A No.
- 12 Q Now, did your understanding ever change regarding
- 13 | what "affiliate" meant, regarding Television Translator, Inc.,
- 14 and in-- or NMTV and Trinity?
- 15 A No, just that we, we had a relationship. We were
- 16 affiliated with Trinity Broadcasting.
- 17 Q In a moral way, in a spiritual way?
- 18 A Yes, sir.
- 19 Q But then there came a time when, when, when NMTV
- 20 owned a television station in Odessa?
- 21 A Yes, sir.
- 22 Q And it had an Affiliation Agreement, didn't it, with
- 23 |--
- 24 A Yes, sir.
- 25 Q -- with Trinity? Well, did its relationship then

```
change, as far as an affiliate is concerned, in your mind?
 2
              I don't remember right now, sir. I, I couldn't tell
 3
    you.
 4
              MR. COHEN: Well, wouldn't this be a good time to
 5
    take a recess, Your Honor?
 6
              JUDGE CHACHKIN: Unless you want to finish up with
 7
    this --
 8
              MR. COHEN: Well, I was going to -- I -- okay.
 9
              JUDGE CHACHKIN: It's up to you. I'll leave it up
10
    to you, Mr. Cohen. Do you want to finish this or do you want
11
   to take a lunch recess now?
12
              MR. COHEN: I would prefer to take the recess.
13
              JUDGE CHACHKIN: All right. Take lunch recess then
14
    till -- we'll make it 1:45.
15
              (Whereupon, at 12:30 p.m. the hearing was in recess
16
   until 1:45 p.m.)
17
18
19
20
21
22
23
24
25
```

1	AFTERNOON SESSION								
2	JUDGE CHACHKIN: Mr. Cohen?								
3	MR. COHEN: Thank you, Your Honor. Pastor, would,								
4	would you direct your attention to the Bureau Exhibit 124,								
5	Mass Media Bureau No. 124?								
6	MR. TOPEL: That's in Volume 3.								
7	BY MR. COHEN:								
8	Q And have you found that?								
9	A Yes, Mr. Cohen.								
10	Q Would you look at page 3, please? And do you see								
11	that Terrence Hickey was elected as Assistant Secretary of								
12	NMTV of Translator Television, Inc.?								
13	A Yes, Mr. Cohen.								
14	Q Now I'm trying to see if this was a meeting you								
15	were present at.								
16	, A I believe not, sir.								
17	Q You believe not. It doesn't appear that you were.								
18	Your name's not reflected on page 1. Were you aware prior to								
19	the meeting date, which was January 19, 1987, were you aware								
20	that Mr. Hickey was going to be nominated as Assistant								
21	Secretary?								
22	A Mr. Cohen, if memory serves me right, Mrs. Duff								
23	called me and, and or I yeah, I think she called me								
24	and, and, and she brought it up in our conversation.								
25	Q And when she								

1	A I								
2	Q Excuse me. I didn't mean to cut you off.								
3	A I, I believe, and I'm al I'm almost positive, that								
4	it was at that time that I told her that I would not be pres-								
5	ent. I believe that in my deposition I submitted those two								
6	pages of calendar for those								
7	Q Yes.								
8	A two meetings that I was not there due to								
9	sickness.								
10	Q I understand that, and I, and I was not going to								
11	ask you about that at all. I was								
12	A Oh. Okay.								
13	Q I was I understood and I respected your an-								
14	swers and I had no difficulty with it.								
15	A Okay, sir.								
16	Q But that, that wasn't what I was going to ask you								
17	about. My question is were you aware prior to the meeting								
18	that Mr. Hickey was propos was proposed to be elected as								
19	Assistant Secretary?								
20	A Yes.								
21	Q And you had no problem with it?								
22	A (No audible response.)								
23	JUDGE CHACHKIN: Are you going to answer his								
24	question?								
25	MR. ESPINOZA: I said no.								

1		JUDGE CHACHKIN: Of course, you have to speak up							
2	where the reporter								
3		MR. ESPINOZA: I'm sorry. Correct.							
4		BY MR. COHEN:							
5	Q	Do you have a recollection as to whether, whether							
6	any explanation was given to you as to why he would be elected								
7	as Assista	ant Secretary?							
8	A	Mr. Cohen, I, I believe that, that that was brought							
9	up in the	discussion. At, at this point I can't give you							
10	precisely	the reason, but I believed we talked about it, Mr.							
11	Cohen.								
12	Q	Do you know what duties he performed as Assistant							
13	Secretary?								
14	A	At this point I don't think I remember, no, sir.							
15	Q	Now, Terrence Hickey, is that a name that you're							
16	familiar with?								
17	A	Yes, sir.							
18	Q	And, and in what context are you familiar with Mr.							
19	Hickey?								
20	A	When I would tape my own program, I would see him							
21	there.								
22	Q	At TBN?							
23	A	Yes, sir.							
24	Q	And do you have an understanding now as to what							
25	strike tha	at. In 1987, did you have an understanding as to							

1	what Mr. H	ickey's role was at TBN?							
2	A	Mr. Cohen, when I last did my program in 1986, if							
3	memory serves me right, his position was that of Program								
4	excuse me Director of Programs, I'm almost sure. But this								
5	is in, in,	in '86.							
6	Q.	And that's the last knowledge you had as to what							
7	his, his r	esponsibilities were at Trinity?							
8	A	I believe so, Mr. Cohen.							
9	Q	I want to ask you about I'm sorry that I don't							
10	have this	handy. Just give me a second. I want to ask you							
11	about Bureau Exhibit 125, which would be in Volume 3. Now,								
12	you notice that there's two pages to that exhibit? There's								
13	page 1 and	a page 2. Do you see that?							
14	A	Yes, sir.							
15	Q .	And your, and your signature is not on the first							
16	page. You	see that?							
17	A	It is not.							
18	Q	But it's on the second page?							
19	A	Yes, sir.							
20	Q	Now, my question is do you have a recollection of							
21	signing th	is Action by Written Consent sometime in 1987?							
22	A	No, sir.							
23	Q	When was the first time you were made aware of this							
24	document?	!							
25	A	Last year.							

1	Q 1993?								
2	A Yes, sir.								
3	Q Now, would you look at Bureau Exhibit 131, which								
4	would be in the same line?								
5	A Yes, sir.								
6	Q Now, you'll notice that the document purports to be								
7	one signed by all of the Directors of Translator TV, Inc. Do								
8	you see that?								
9	A Not all of them.								
10	Q Well, it, it states, "All of the Directors of								
11	Translator TV, Inc., hereby take the following action." Do								
12	you see that?								
13	A Yes, sir.								
14	Q And your name is not on that.								
15	A That's correct.								
16	Q Now, prior to the time this was brought to your								
17	attention in the deposition, had you ever been made aware of								
18	the existence of this document?								
19	A Mr. Cohen, it clearly doesn't look familiar.								
20	Q And I take it you had no knowledge as to how this								
21	document came to be prepared?								
22	A No, I do not, sir.								
23	Q Now, I'm wondering if you know why it was decided to								
24	elect Jane Duff to the position of Assistant Secretary?								
25	A No, I do not.								

1	Q	She was already an Officer of NM of Translator								
2	Television, Inc., wasn't she?									
3	A Yes, sir.									
4	Q	And no one ever told you why she was being elected								
5	as Assistant Secretary?									
6	A	No, sir.								
7	Q	Do you know what she did as Assistant Secretary?								
8	A	No, sir.								
9	Q	Now, I want to ask you to direct your attention to								
10	Bureau Exhibit 130, and would, would you please review that									
11	and tell me when you have. 130.									
12		MR. TOPEL: 130?								
13		MR. COHEN: 1 3 0.								
14		BY MR. COHEN:								
15	Q	Tell me when you've read it. Have you read it?								
16	A	(No audible response.)								
17	Q	Was Mr. Hickey Secretary of Translator TV, Inc.?								
18	A	Not that I knew of, sir.								
19	Q	And prior to the time that this document was shown								
20	to you in	your deposition were you aware of it?								
21	A	I don't believe so, Mr. Cohen.								
22	Q	Would you look at Bureau Exhibit 147? And I what								
23	I want to	do is direct your attention to the last full para-								
24	graph on ]	page 1 which continues over to page 2. Would you								
25	please rea	ad that?								

1	A	Starting with, "It was then moved"?							
2	Q	"It was then moved"							
3	A	Just that paragraph?							
4	Q	Yes, sir. Yes, sir. Pastor, what I, what I want							
5	like to k	now is do you know why it took some six-and-a-half							
6	years between the time Translator TV was incorporated and at								
7	the time a	a resolution was made to open a bank account?							
8	A	Mr. Cohen, I believe no, that I don't remember.							
9	Q	Now, during the intervening period, that is, from							
10	September	of 1980 until when, when Translator Television,							
11	Inc., was	organized until June of '87 when this Minute is							
12	dated, die	d Translator Television, Inc., have occasion to have,							
13	to have cl	necks written on its behalf?							
14	A	Mr. Cohen, at this point I honestly don't remember.							
15	Q	Well, it did, it did some business during that							
16	period of	time. It, it owed some money							
17	A	Yes.							
18	Q	Well, do you know who was do you know whose							
19	checks we	re being used to pay whatever bill the company was							
20	paying?								
21	A	No, I do not, sir.							
22	Q	Do you know who was signing the checks?							
23	A	I don't think so.							
24	Q	I want you to look at Bureau Exhibit 163.							
25	A	Yes, sir.							

1	Q Now, read that, if you would, would you read that to
2	yourself and then tell me when you've read it?
3	A Yes, Mr. Cohen.
4	Q Now, you agree that in October '87 NMTV was, was
5	deeply in the red?
6	A If, if that's what the records indicate, I'll accept
7	that, sir.
8	Q Well, in your deposition you were asked a question,
9	I think by my colleague, Mr., Mr. Shook, at page 161, line 10
10	now, correct me if I'm wrong.
11	MR. TOPEL: Let me show you the deposition.
12	BY MR. COHEN:
13	Q California Deposition 161, line 10, Mr. Shook asked
14	you: "Now, correct me if I'm wrong, but my viewing of
15	National Minority TV, Inc.'s financial documents at this time
16	reflect a corporation that's deeply in the red. Would that be
17	your assessment also?" And your answer was: "Yes."
18	Now, the question that I, I want to ask you is given
19	the fact that NMTV was, was in the red, did you have any
20	understanding as to why the Corporation was now seeking to
21	purchase a construction permit for a sum not to exceed
22	\$600,000?
23	A Why?
24	Q Yes.
25	A If, if memory serves me right, I think we had talked

```
about obtaining the loan from Trinity Broadcasting, sir.
 2
              Well, at the time of your deposition, let me read to
 3
    you what Mr. Shook asked you and what you answered.
 4
    question was, "Can you give me..." --
 5
              MR. TOPEL:
                          Could you --
 6
              MR. COHEN:
                          -- "...some explanation..." --
 7
              MR. TOPEL:
                          You can read --
              MR. COHEN:
 8
                          Page 161, line 15. "Can you give
 9
    me..."
10
              MR. TOPEL:
                          Thank you.
11
              BY MR. COHEN:
12
         0
              California.
                           "Can you give me some explanation as to
13
    why it is that National Minority TV, Inc., is seeking to buy
14
    another television station with its financial condition being
15
    what it was at the time?" And your answer was:
                                                     "Right now I
16
    couldn't tell you."
17
              So, what I, what I want to know is -- from you is
18
    did you have an understanding in 1987 that Trinity would loan
19
    or advance whatever funds were required to purchase television
20
    stations that NMTV sought to purchase?
21
         Α
              Presently that is my recollection, Mr. Cohen.
22
              Presently that's your recollection?
23
         Α
              Yes, sir.
24
              And was there any limit to the amount of money that
25
    Trinity would, would advance a loan?
```

1	A That I really don't remember, sir. I don't						
2	remember.						
3	Q Do you recall any discussion on, on the point of						
4	what you what the extent of, of, of what ex the extent						
5	of what funds Trinity, Trinity was prepared to advance a loan						
6	to NMTV?						
7	A Mr. Cohen, I'm sure there was some discussion, but						
8	I, I couldn't, I couldn't give you the content right now, sir.						
9	Q Did you ever talk when you were a Director of, of						
10	NMTV, with your co-Directors about the, the future of NMTV in						
11	terms of whether it would always be, be always have a						
12	relationship with Trinity?						
13	A Mr. Cohen, I don't think I ever brought that up. I						
14	believe not, sir.						
15	Q Well, did there ever come a time when, when, when						
16	you discussed with your co-Directors the thought of NMTV						
17	breaking away from Trinity?						
18	A Like I said, I don't think I ever brought it up,						
19	sir.						
20	Q But did, did the Mr. Crouch or Mrs. Duff bring it						
21	up to you?						
22	A Not to the best of my recollection.						
23	Q I want to show you the, the application to purchase						
24	Odessa. That would be Bureau Exhibit 129.						
25	MR. TOPEL: That's in Volume						

1		BY MR. COHEN:							
2	Q	And, first, just kind of leaf through that. I'm not							
3	going to	be asking you questions about it, but I just want to							
4	see if you have any familiarity with it.								
5	A	Up to page 4, Mr. Cohen?							
6	Q Well, let me, let me help you. Look start look-								
7	ing at the S&E portion which begins at page 22. That's for								
8	I think								
9	A	You did say 129, right? Page							
10	Q	Exhibit 129.							
11	A	Yeah, Exhibit 129.							
12	Q	Start looking at page 22, and that continues on							
13	through page 43, just sort of leaf through it. I'm not going								
14	to ask you any detailed questions about it.								
15		(Pause.)							
16		MR. ESPINOZA: Mr. Cohen, through page 43?							
17		BY MR. COHEN:							
18	Q	Yes.							
19	A	I have just quickly glanced							
20	Q	Thank you.							
21	A	through it, sir.							
22	Q	My question is, is my question, first of all, did							
23	you, did	you play any role in the preparation of this applica-							
24	tion?								
25	A	I believe not, sir.							

1		Q	Did	you	sup	do	you	recall	supplying	any	informa-	
2	tion	that	was	set	forth	in	that	applic	cation?			

- A Having just glanced through it, I would have to say no.
- Q And do you ever remember seeing that application prior to your deposition?
- 7 A Yes, sir.
- Q And when do you recall seeing it? To help you, do
  you want to --
- 10 | A If --
- 11 Q -- know when it was filed? Would that help, would
- 12 | that help you?
- 13 A No. You're asking me where I saw it or when I saw
- 14 | it?
- Q Well, two questions, when and where. But to help
- 16 you, do you want to know when it was filed? Would that help
- 17 you?
- 18 A Sure.
- 19 Q It was filed with the Commission in February of
- 20 1987.
- 21 A I was going to say that I believe I saw it in, in
- 22 Mrs. Duff's office, sir.
- 23 | Q And do you remember when you saw it, approximately?
- 24 A No. No. I'd be quessing, sir.
- 25 Q And you were never sent a copy of that application?

1	A No.
2	Q Now, I want to ask you the same questions about the
3	Portland application, which is Exhibit 174, and it's in the
4	same volume, and just look, beginning at page 1, look through
5	page 16.
6	(Pause.)
7	BY MR. COHEN:
8	Q Now, am I correct that that application was never
9	sent to you before it was filed?
10	A That's correct, sir.
11	Q Nor was the Odessa application never sent to you
12	before it
13	A No, no, sir.
14	Q was filed? Now, do you recall before your depo-
15	sition at any time before your deposition ever seeing the
16	Portland application?
17	A Mr. Cohen, that one I really don't remember.
18	Odessa, I believe I saw it, but Portland, I'm really not sure.
19	Q Making you work, pastor. Would you look at Exhibit
20	176? Have you found it, sir?
21	A Oh, I'm sorry. I'm reading it.
22	Q Exhibit 176.
23	A Um-hum. You
24	Q I just want you to find it. Do you have it in front
25	of you?

1	A Yes, sir.
2	Q Yes. Now, bringing you back to January, bringing
3	you back to January of 1988, do you have any recollection of,
4	of anybody talking with you about the fact that Messrs. Hickey
5	and Crouch were going to be nominated and elected of Assistant
6	Secretary to the Corporation?
7	A Mr. Cohen, I'm under the impression that it was Mrs.
8	Duff that, that called me and told me about it.
9	Q She told you that both, both of those gentlemen were
10	going to be elected as Officers?
11	A That's, that's my memory, sir.
12	Q Did you did she explain to you why NMTV needed
13	two assistant secretaries?
14	A I'm, I'm sure she did. Right now I wouldn't remem-
15	ber what she said, but I'm almost sure she did, sir.
16	Q Did you, did you query her? Did, did it seem unu-
17	sual to you that a corporation doing what NMTV was doing
18	needed two assistant secretaries?
19	A I don't remember if I did or I didn't, sir.
20	Q Do, do you have an understanding as you sit here
21	today as to what Messrs. Crouch and Hickey did in carrying out
22	their roles as Assistant Secretary?
23	A Today, no, sir, I, I believe not.
24	Q Now, I showed you a Minute where NMTV was going to
25	be opening a bank account. So we discussed that a few

1 minutes ago. I can find that for you.
2 A I believe so, sir.

- Q Well, let, let me help you. Bureau Exhibit 147, and I'm not going to ask you about it. Again, I just want to
- 5 refresh your recollection that's the Minute where, where the
- 6 Corporation was authorized to open up a bank account. Do you
- 7 see that at the bottom of 147?
- 8 A "It was then moved..."
- 9 Q Yeah.
- 10 A Um-hum.
- 11 Q Now, do you know who, do you know who received that
  12 check, who, who received the monthly statement that the bank
  13 sends out regarding the checking account?
- 14 A If memory serves me right, it would have been sent 15 to the address of NMTV, sir.
- Q And do you know what person would have reviewed that?
- 18 A Mrs. Duff. That's my understanding.
- 19 Q Did you -- those -- the, the checking account state-20 ments were never sent to you, were they?
- 21 A Oh, no.
- 22 Q And you never saw them?
- 23 A No, sir.
- Q I want to ask you to look at Bureau Exhibit 230.
- MR. TOPEL: Volume 4, pastor.

1		MR. ESPINOZA: Give me that number again, please,
2	sir?	
3		MR. COHEN: 230, pastor. Now, would, would you read
4	that Minu	te, and then tell me when you've read it?
5		JUDGE CHACHKIN: Weren't this read this Minute.
6		MR. COHEN: I don't think I've asked him this ques-
7	tion. If	I have
8		JUDGE CHACHKIN: Well, why don't, why don't you just
9	direct him	n to what portion you want him to look at?
10		MR. COHEN: Thank you, Your Honor. That's helpful.
11	I'm, I'm -	what I want, I want to ask him about
12		BY MR. COHEN:
13	Q	I want to ask you, sir, about the 600 strike that
14	the sur	n that was to be pur that was to be agreed upon
15	A	If you could direct me
16	Q	to purchase
17	A	to the paragraph, sir, perhaps, please?
18	Q	Yes. Paragraph 5
19	A	One, two, three
20	Q	and 6.
21	A	Okay.
22	Q	Now, where was the, the where were the funds to
23	come from	to pay for the, the construction of the building?
24	A	Again, Mr. Cohen, I believe it would have been the
25	loan from	Trinity Broadcasting.

1	Q And was there, was there a discussion as to what
2	the, the terms or the conditions of that loan were to be?
3	A I, I don't recall, sir.
4	Q Do you have any do you have a recollection of
5	ever talking at any time while you were a Director about what
6	the terms and conditions of any loan from Trinity to NMTV,
7	what those terms and conditions were to be?
8	A Yes, sir. I remember at times I, I spoke with Mrs.
9	Duff and, and we would cover different areas. Did we talk
10	about it? Yes. I can't give you the substance right now. I
11	honestly don't remember, sir.
12	Q Please look at Mass Media Bureau Exhibits 236 and
13	well, look through 236 and 237. I can tell you the question
14	that I have and then we will go quicker. 236 is the Annual
15	Meeting of the Combined Boards of Directors of Trinity and
16	Affiliated Corporations, and you will note that Television
17	Trans
18	COURT REPORTER: Excuse me.
19	(Off the record. Back on the record.)
20	BY MR. COHEN:
21	Q You'll note that NMTV is not, underscore not, one of
22	the companies as set forth therein. NMTV is excluded. Do you
23	see that, in Exhibit 236? Do you agree with me that T NMTV
24	is not mentioned there as an affiliated company?
25	MR. TOPEL: I think the witness looks lost. Why